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Case 2:21-cv-05268-JMY Document 62 Filed 07/29/22 Page 1 of 1

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Page: 1 of 1

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July 28, 2022

Via Facsimile

Judge John Milton Younge
4007 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106
Courtroom 4-A
Fax: (267) 299-7368

RE: Williams v. City of Philadelphia, et al., No. 2:21-cv-5268 – Agreed Proposal for 5-Day Extension of Briefing Schedule on Defendant John Grier's Motion to Dismiss

Your Honor,

This communication is made pursuant to Section A.1. of your Policies and Procedures.

On June 20, 2022, Defendant Officer John Grier filed a motion to dismiss Plaintiff's Amended Complaint. (Dkt. # 54.) Plaintiff's response is currently due this Friday, July 29, 2022, per a previously stipulated extension. (Dkt. # 60.)

With Defendant Grier's agreement, Plaintiff requests an additional five (5) days to oppose Defendant's motion, until next Wednesday, August 3, 2022. In conjunction, Plaintiff and Defendant Grier request that Defendant Grier's reply be due August 24, 2022.

Plaintiff's counsel's need for a short, five-day extension here is the result of having responsibility for several depositions this week and is not intended for purposes of delay.

Please let us know if you need anything further.

Sincerely,

/s/ John Marrese
John Marrese
One of the Attorneys for Plaintiff

Cc: Alison Guest, Counsel for Defendant John Grier (via email)